

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

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April 4, 2018

Kelley Catlin
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Subject: Proposal for Supplemental Environmental Project (Amended from March 19, 2018)
Addendum Attached to Revised Proposal Dated April 4, 2018
Offer to Mitigate Civil Violations Related to Consent Agreement and Final Order
(CAFO)

Dear Ms. Catlin:

Thank you for your cooperation in the above captioned matter. Mandava Associates, LLC, Regulatory and Environmental Consultants, EST, Inc., Company and Industry, Michael Fischer, Attorney, Kelley Catlin and Mark Leshner, EPA Region 7 Representatives, who were the participants, concluded a conference call related to the Supplemental Environmental Policy (SEP) proposal dated and submitted on March 30, 2018 in response to the submitted proposed SEP.

Based on the EPA findings and our discussions, EPA originally proposed a fine of 75,773.00 for 12 counts of violations for selling or offering for sale unregistered EPA pesticide products. In the proposed negotiations, EST provided information that most of the products were an only a one time sale for Research and Development or Test Marketing Purposes and thus have been discontinued.

The EPA proposed conducting a SEP to may assist with mitigation of the proposed EPA violations and retained Mandava Associate to completer the SEP, any corrective actions and to maintain. EPA compliance. EST retained Mandava Associates, LLC to conduct an SEP and EPA may take consideration to mitigate the violations in consideration of the completion of the SEP.

EPA reviewed the SEP proposal and negotiations and rationales presented by EST and in consideration of the facts reduced the penalty to 4 counts of violations and remaining assumed violations are being issued as a Notice of Warning resulting in Violation Fee of \$27,200 issues. In consideration, EPA took the cost of completion of the SEP not at a dollar but for dollar ratio and mitigated proposed a final violation fee of 19,620.00.

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On behalf EST, Inc., we accept the EPA Region 7 proposed offer for FIFRA civil violations under EPA Regulations that may have occurred in the amount of \$19,620.00.

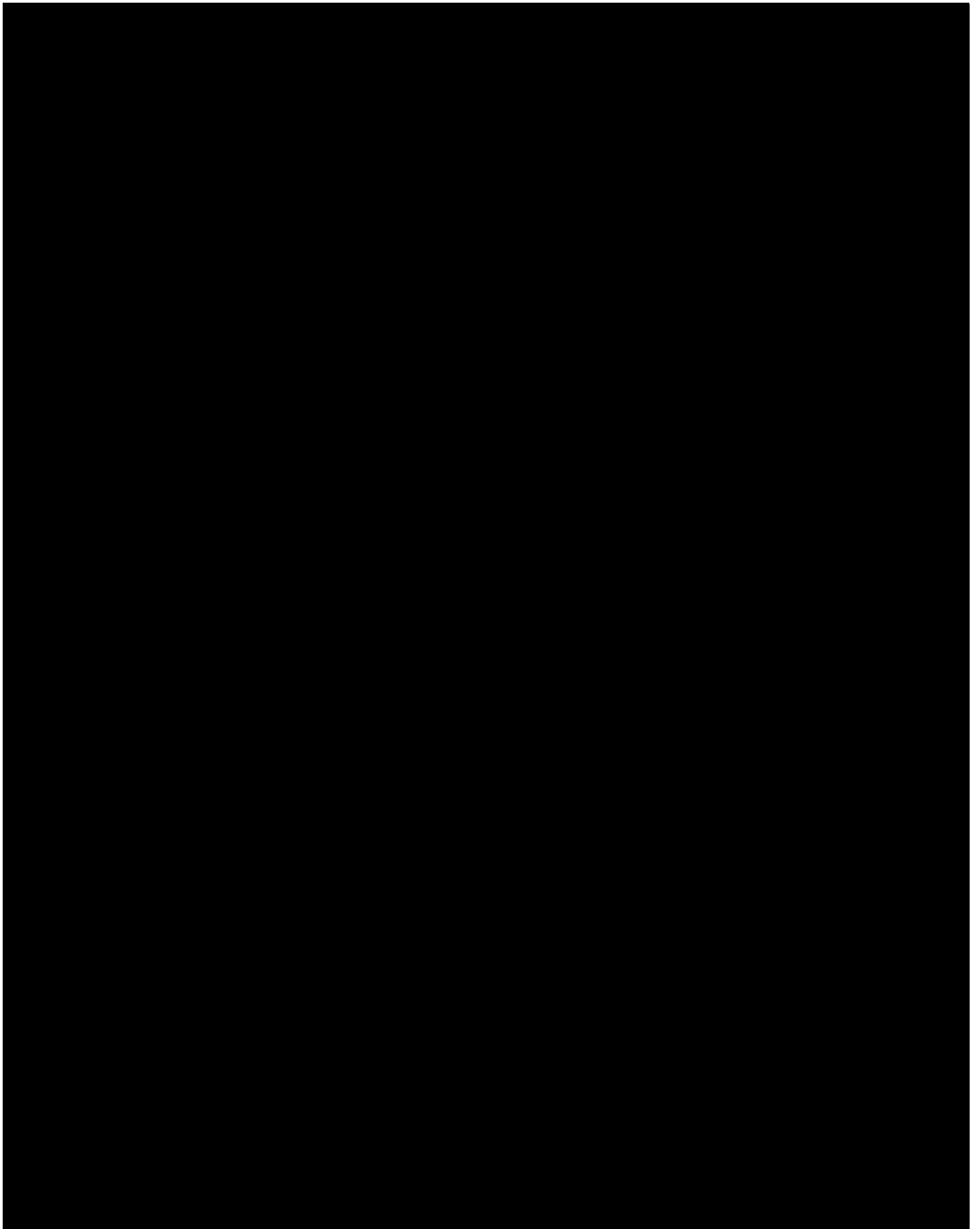
Please send us the CAFO for our review and final acceptance. If you should have any questions regarding this matter, please contact me directly.

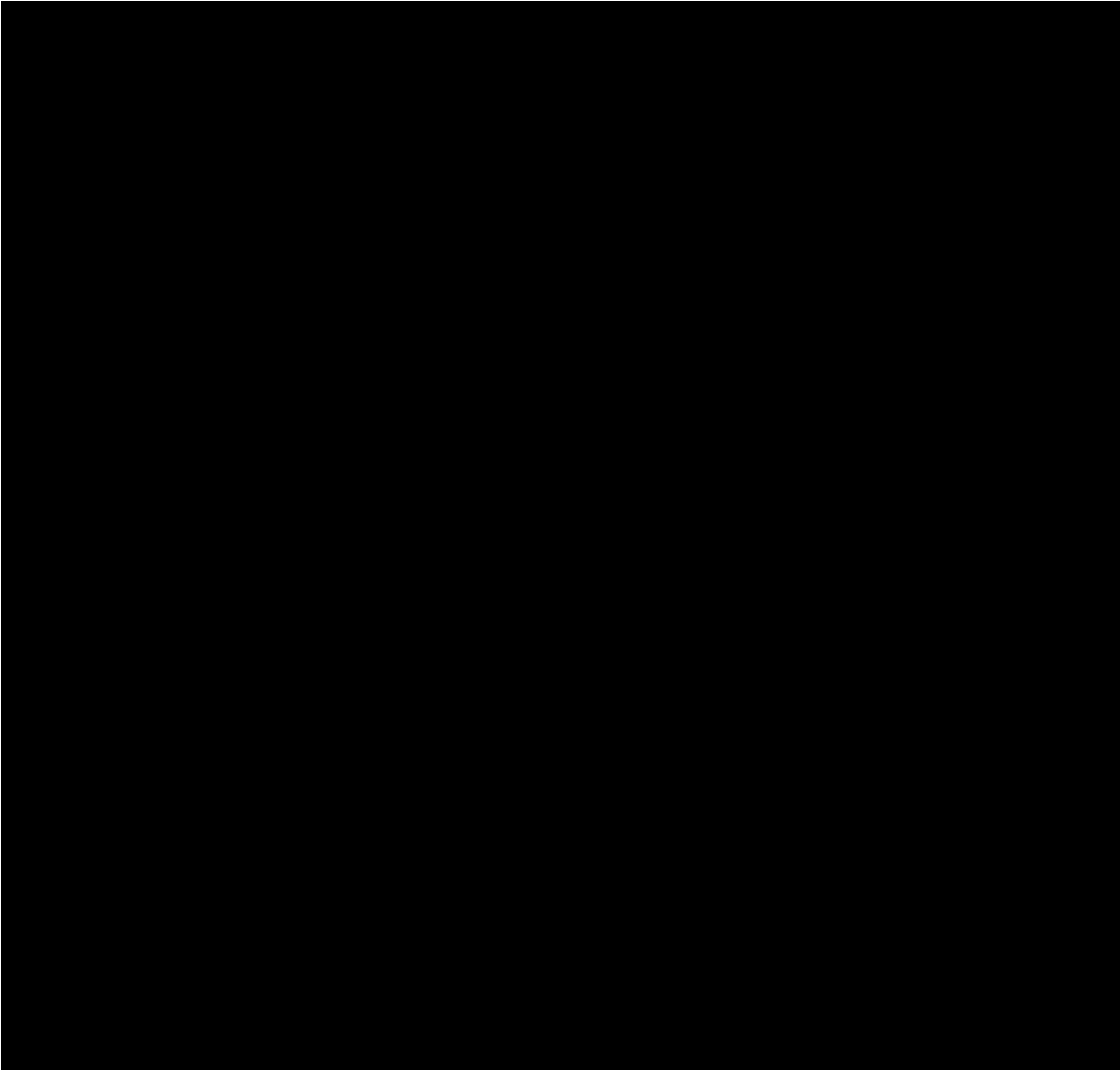
Sincerely Yours,

A handwritten signature in black ink, appearing to read "M. Mandava", followed by a horizontal line.

Madhu Mandava
Mandava Associates, LLC
Agent for EST, Inc.
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Plano, TX 75093
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Non-Responsive





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